

DECLARATION OF LYNN R. FARNY

1 I, Lynn R. Farny, do declare:

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3 1. I am over 18 years of age and make this declaration of
4 my own personal knowledge and for those matters stated upon
5 information and belief, I believe them to be true and accurate.
6 If called as a witness to testify as to the matters herein, I
7 could and would do so competently.

8 2. I am corporate Secretary of the Church of Scientology
9 International ("CSI"), a California religious corporation.

10 3. I have reviewed the photographs which are attached to
11 the declarations of Sam Brown and Thorn Smith, Exhibits D
12 and I to the Supplemental Memorandum in Support of Motion to
13 Dismiss the Complaint. I recognize the individual in the
14 photographs attached to the Smith declaration as John Koresko
15 and the individual in the photographs attached to the Brown
16 declaration as Gerald Armstrong.

17 4. I am well familiar with Gerald Armstrong, as I have
18 worked in the legal department of CSI since 1984, and prior to
19 that in the legal department of Church of Scientology of
20 California ("CSC"). I have actively followed the events
21 occurring during that time in lawsuit against Gerald Armstrong
22 by CSC regarding his theft of private documents belonging to
23 the Founder of the Scientology religion.

24 5. I am also well familiar with John Koresko, who was
25 office manager and later a paralegal for Joseph A. Yanny,
26 CSI's former attorney, during the time that Yanny represented

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1 CSI and afterwards, when CSI and CSC sued Yanny for his
2 breaches of fiduciary duties.

3 6. That Armstrong is amenable to the kind of covert
4 representation in which Yanny is engaging in this case is
5 highlighted by his recorded remarks made in November 1984. At
6 that time, Armstrong was plotting against the Scientology
7 Churches and seeking out staff members in the Church who would
8 be willing to assist him in overthrowing Church leadership. The
9 Church obtained information about Armstrong's plans and,
10 through a police-sanctioned investigation, provided Armstrong
11 with the "defectors" he sought. On November 30, 1984, Armstrong
12 met with one Michael Rinder, an individual whom Armstrong
13 thought to be one of his "agents" (but who in reality was loyal
14 to the Church). In the conversation, recorded with written
15 permission from law enforcement, Armstrong stated the following
16 in response to questions by Mr. Rinder as to whether they had
17 to have actual evidence of wrongdoing to make allegations
18 against the Church leadership:

19 ARMSTRONG: They can allege it. They can allege
20 it. They don't even have -- they can allege it.

21 RINDER: So they don't even have to -- like -- they
22 don't have to have the document sitting in front
23 of them and then --

24 ARMSTRONG: Fucking say the organization destroys
25 the documents.

26 * * *

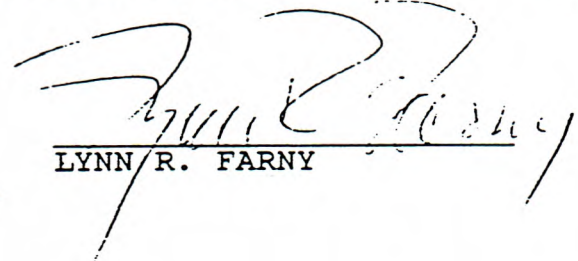
27 Where are the -- we don't have to prove a goddamn
28 thing. We don't have to prove shit; we just have

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to allege it.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed in Los Angeles, California the 26th day of August 1991.


LYNN/R. FARNY